

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION**

<b>BRANDON LIVAS, <i>ET AL.</i></b>	)	<b>CIVIL ACTION NO. 20-cv-00422</b>
	)	
<b>VERSUS</b>	)	<b>JUDGE DOUGHTY</b>
	)	
<b>RODNEY MYERS, <i>ET AL.</i></b>	)	<b>MAGISTRATE JUDGE KAY</b>
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**OBJECTIONS TO EXHIBITS**

Respondents object to Petitioners' exhibits as follows:

A. Declaration of Joe Godenson, MD (Doc. 9-3, Ex. 1)

Federal Respondents object to Dr. Godenson's declaration to the extent that it contains opinions that Dr. Godenson has not demonstrated that he is qualified to render based upon his knowledge, skill, experience, training, or education. FRE 702; Doc. 9-3, ¶¶26, 27-8, 33 . Federal Respondents also object to purported factual statements made by Dr. Godenson that are not based upon his personal knowledge, lack foundation, and are speculative. FRE 602; Doc. 9-3, ¶¶ 15, 19, 22, 24-6, 30, 35. Finally, Federal Respondents object to statements that are not relevant to the instant matter. FRE 401, 402; Doc. 9-3, ¶¶ 16, 18, 20.

B. Declaration of Gaines Andrews (Doc. 9-4, Ex. 2)

Federal Respondents object to Inmate Andrews' declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-4, ¶¶ 2-3, 5. Federal Respondents also object to Inmate Andrews' statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-4, ¶¶ 7-11, 14, 16.

C. Declaration of Richard Buswell (Doc. 9-5, Ex. 3)

Federal Respondents object to Inmate Buswell's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-5, ¶¶ 4, 5. Federal Respondents also object to Inmate Buswell's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-5, ¶¶ 3-4, 7-10, 12-13, 15-17. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-5, ¶17.

D. Declaration of Pio Alejandr Campos (Doc. 9-6, Ex. 4)

Federal Respondents object to Inmate Campos' declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-6, ¶¶ 13. Federal Respondents also object to Inmate Campos' statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-6, ¶¶ 6-8, 11, 14. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-6, ¶ 3. Federal Respondents object to Inmate Campos' testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

E. Declaration of Daniel Collins (Doc. 9-7, Ex. 5)

Federal Respondents object to Inmate Collins' declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-7, ¶¶ 4-5. Federal Respondents also object to Inmate Collins' statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-7, ¶¶ 3-4, 6-8, 11, 14-15. Federal Respondents object to Inmate Collins' testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

F. Declaration of Dewayne Corbett (Doc. 9-8, Ex. 6)

Federal Respondents object to Inmate Corbett's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-8, ¶¶ 2, 5. Federal Respondents also object to Inmate Corbett's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-8, ¶¶ 3-6, 9. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-8, ¶ 7.

G. Declaration of Brandon Livas (Doc. 9-9, Ex. 7)

Federal Respondents object to Inmate Livas' declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-9, ¶¶ 4-6. Federal Respondents also object to Inmate Livas' statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-9, ¶¶ 3-7, 11, 14. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-9, ¶ 13.

H. Declaration of Carlos Lorenzo Martin (Doc. 9-10, Ex. 8)

Federal Respondents object to Inmate Martin's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-10, ¶¶ 2-6. Federal Respondents also object to Inmate Martin's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-10, ¶¶ 4-8. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-10, ¶ 8, 10.

I. Declaration of Hector Perez (Doc. 9-11, Ex. 9)

Federal Respondents object to Inmate Perez's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-11, ¶¶ 2, 8-9. Federal Respondents also object to Inmate Perez's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-11, ¶¶ 1, 3-4, 6-7, 9-10. Federal Respondents object to Inmate

Perez's testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

J. Declaration of Justin Scott (Doc. 9-12, Ex. 10)

Federal Respondents object to Inmate Scott's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-12, ¶¶ 2, 5. Federal Respondents also object to Inmate Scott's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-12, ¶¶ 4-9, 11. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-12, ¶ 3. Respondents object to Inmate Perez's testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

K. Declaration of Johnny Smith (Doc. 9-13, Ex. 11)

Federal Respondents object to Inmate Smith's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-13, ¶¶ 6-8. Federal Respondents also object to Inmate Smith's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-13, ¶¶ 3-8, 11-12. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-13, ¶ 13, 15.

L. Declaration of John Sposato (Doc. 9-14, Ex. 12)

Federal Respondents object to Inmate Sposato's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-14, ¶¶ 5. Federal Respondents also object to Inmate Sposato's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-14, ¶¶ 1, 3, 5-7, 9-12. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-13, ¶ 4, 8. Federal Respondents object to

Inmate Sposato's testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

M. Declaration of Arthur Wammel (Doc. 9-15, Ex. 13)

Federal Respondents object to Inmate Wammel's declaration to the extent that it offers an improper lay opinion. FRE 701; Doc. 9-15, ¶¶ 4, 6. Federal Respondents also object to Inmate Wammel's statements that are either not based on his personal knowledge, lack foundation, or are speculative. FRE 602; Doc. 9-15, ¶¶ 3-4, 9, 14. Federal Respondents also object to any statements that contain hearsay. FRE 801, 802; Doc. 9-13, ¶7. Federal Respondents object to Inmate Wammel's testimony to the extent that he seeks relief and is not a named defendant. Such relief is premature.

Respectfully submitted,

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